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UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

SUSANNE SALVATI-BRYANT,)
)
Plaintiff,)
)
v.)
)
NANCY A. BERRYHILL,)
Acting Commissioner of Social Security,)
)
Defendant.)

Case No. 2:17-cv-01406-JAD-CWH

**CONSENT MOTION FOR
FINAL ENLARGEMENT OF THE
BRIEFING SCHEDULE**

PLAINTIFF, SUSANNE SALVATI-BRYANT, ("Plaintiff"), by her attorney, Heather Freeman, moves this Honorable Court to grant her unopposed motion for a final enlargement of the briefing schedule through November 20, 2017, in order to file cross-motions to reverse or remand and to affirm the Commissioner's decision. In support of this Motion, Plaintiff states as follows:

Pursuant to this Court's Order on Plaintiff's prior motion, (doc. 11), the cross-motions are due on November 15, 2017. This additional and final five day extension is being requested due to unforeseen weather related damage and the need to arrange for emergency repairs, which has affected counsel's schedule. In sum, undersigned counsel lives in NH, where a significant wind and rain storm caused power and internet outages through Saturday, Nov. 4, with a flash flood washing out a significant portion of the only access road. While repairs were being coordinated,

1 additional weather yesterday has washed out even more of the road, resulting in a critical
2 condition that must be immediately addressed (there is no manner of driving around the growing
3 sinkhole, this is the only access to the house, and it must be repaired before heavy snow starts or
4 fuel deliveries are needed). With this complication, counsel has been unable to recover the time
5 lost earlier this month, resulting in scheduling complications. No further extensions will be
6 requested.

7 Counsel for the Commissioner has no objection to this Motion.

8 WHEREFORE, Plaintiff respectfully requests that this consent Motion be granted,
9 allowing an enlargement of the briefing schedule through November 20, 2017, in order to file
10 cross-motions to reverse or remand and to affirm the Commissioner's decision.
11

12 Date: November 15, 2017

Respectfully submitted,

/s/Heather Freeman

HEATHER FREEMAN

Attorney for Plaintiff

15 IT IS SO ORDERED.

16 DATED: 11/16/17

18
19 C.W. HOFFMAN, JR.

UNITED STATES MAGISTRATE JUDGE